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8 Attorneys for Defendants and Cross-Complainant

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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 EADGEAR, INC., a California corporation,  
13 and GOFUNPLACES, INC., a British Virgin  
14 Islands corporation

15 Plaintiffs,

16 v.

17 RANDAL WILLIAMS, an individual,  
18 PROSPERITY FORMULA, LLC, a limited  
19 liability company, JUBIMAX, LLC, a  
20 limited liability company, JUBIMAX, INC.,  
21 a British Virgin Islands corporation,  
22 AFFILIATE PRO, INC., a British Virgin  
23 Islands corporation, and DOES 1 to 100,  
inclusive,

Defendants.

AND CONSOLIDATED CROSS-ACTION

RANDAL RAY WILLIAMS

Cross-Complainant,

v.

EADGEAR HOLDINGS USA, INC. et al.  
Cross-Defendants.

Case No.: C 13-01186 JCS

Case No.: C 14-00504 JCS

(CONSOLIDATED)

**STIPULATION FOR REQUEST FOR  
VOLUNTARILY DISMISSAL WITH  
PREJUDICE AND [PROPOSED] ORDER**

**Judge: Hon. Joseph C. Spero**

MIKE DRIGGERS, JR., on one hand, and RANDAL WILLIAMS, on the other hand,  
entered into a Stipulation for Request for Dismissal with Prejudice and respectfully request the  
Court to enter into a dismissal as following:

1. EADGEAR, INC., GOFUNPLACES, INC. filed a Complaint in the above-  
captioned action on or about March 15, 2013 against RANDAL WILLIAMS, PROSPERITY

1 FORMULA, LLC, JUBIMAX, LLC, JUBIMAX, INC., and AFFILIATE PRO, INC.;

2 2. RANDAL WILLIAMS filed a Complaint in the U.S. District Court for the  
3 Western District of Texas on or about February 21, 2013. On or about August 2, 2013, RANDAL  
4 WILLIAMS filed his Third Amended Complaint, naming defendants including EADGEAR  
5 HOLDINGS USA, INC., EADGEAR, INC., GOFUNPLACES, INC., SEEFREED TRAVEL,  
6 FRANCIS YUEN, CHARLES WANG, MIKE DRIGGERS, JR., GLEN JENSEN, LOURATA  
7 CHAN, CHILIN WU, XIN CHEN, JIMMY QI, SHERRY CHEN, and GOFUNPLACES, SRL.  
8 (hereinafter the "Western District of Texas Action");

9 3. RANDAL WILLIAMS has previously dismissed SEEFREED TRAVEL and  
10 GLEN JENSEN from the Western District of Texas Action. Further, RANDAL WILLIAMS  
11 moved for entry of default of judgment against GOFUNPLACES, SRL;

12 4. On or about February 3, 2014, the Western District of Texas Action was  
13 transferred to the U.S. District Court for the Northern District of California and this Court  
14 subsequently consolidated the Western District of Texas Action with the above-captioned action;

15 5. All parties have appeared and have filed answers in the above-captioned action,  
16 except EADGEAR HOLDINGS USA, INC. and GOFUNPLACES, SRL. RANDAL  
17 WILLIAMS hereby withdraws his motion for entry of default of judgment against  
18 GOFUNPLACES, SRL;

19 6. Some of the parties resolved their disputes amicably, leaving only the dispute  
20 between RANDAL WILLIAMS and MIKE DRIGGERS, JR., which remaining dispute has now  
21 been resolved pursuant to a written Settlement Agreement.

22  
23 WHEREFORE, all parties respectfully request the Court to enter into an order to dismiss  
24 with prejudice the remaining dispute between RANDAL WILLIAMS and MIKE DRIGGERS,  
25 JR., and all matters that were or could have been asserted by each of them, and any and all claims  
26 by one party against the other, which shall have the effect of completely resolving all remaining  
27 disputes in this litigation. Each dismissed party shall bear its/his/her attorney's fees and case  
28 costs.

1 IT IS SO STIPULATED.  
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MIKE DRIGGERS, JR.

Date: \_\_\_\_\_

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7 \_\_\_\_\_  
RANDAL WILLIAMS

Date: \_\_\_\_ January 22, 2015 \_\_\_\_

8  
9 APPROVED AS TO FORM:

10 DATED: January \_22\_, 2014

VENARDI ZURADA, LLP

11 By: /s/ Martin Jacek Zurada  
12 Martin Jacek Zurada, Esq.

13 Attorneys for Defendants  
14 RANDAL WILLIAMS  
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1 IT IS SO STIPULATED.  
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5 MIKE DRIGGERS, JR.

Date: January 22, 2015

6  
7 RANDAL WILLIAMS

Date: \_\_\_\_\_

8  
9 APPROVED AS TO FORM:

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11 DATED: January \_\_\_\_, 2014

VENARDI ZURADA, LLP

12 By: /s/ Martin Jacek Zurada  
Martin Jacek Zurada, Esq.

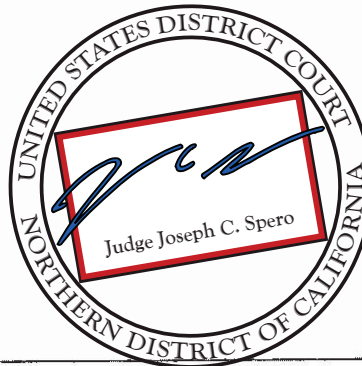
13 Attorneys for Defendants  
14 RANDAL WILLIAMS  
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**ORDER**

GOOD CAUSE APPEARING, IT IS ORDERED that a DISMISSAL WITH PREJUDICE is entered into on 02/13/15, 2014 as to the complaints and claims, that were or could have been asserted, between MIKE DRIGGERS, JR. and RANDAL WILLIAMS. Each dismissed party shall bear its/his/her attorney's fees and case costs.

IT IS SO ORDERED.



Dated: 02/13/15

Chief UNITED STATES ~~DISTRICT~~ JUDGE  
Magistrate

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

EADGEAR, INC., et al.,  
Plaintiffs,

v.

RANDAL WILLIAMS, et al.,  
Defendants.

Case No. [13-cv-01186-JCS](#)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District Court, Northern District of California.

That on 2/13/2015, I SERVED a true and correct copy(ies) of the attached, by placing said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office delivery receptacle located in the Clerk's office.

Mike Driggers, Jr.  
P.O. Box 2583  
Martinez, CA 94553

Dated: 2/13/2015

Richard W. Wieking  
Clerk, United States District Court

By: Karen L. Hom  
Karen Hom, Deputy Clerk to the  
Honorable JOSEPH C. SPERO